



Solutia Inc.
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July 9, 2002
(Via certified or express mail)

Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Thomas Martin
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
14 - July 2002 Monthly Report**

Dear Mr. Turner and Mr. Martin,

Enclosed is the July 2002 Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting.

Sincerely,

Alan G. Faust
Project Coordinator
Solutia Inc.

cc:

Michael Ribordy - USEPA Region 5
Sauget File - Solutia
S. Bron - IEPA
Mayor D. Reed - Cahokia
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

Mike Henry - IDNR
Kevin de la Bruere - USF&WS
Mayor P. Sauget - Sauget, IL

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Monthly Report

Date of Report: July 9, 2002
Period Covered: June 1, 2002 – June 30, 2002
Next Report Period: July 1, 2002 – July 31, 2002

Background

A Unilateral Administrative Order ("UAO") was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan ("TCRAWP") was initially submitted to the Agencies June 30, 2000 for review and approval. Agreements sufficient to proceed with issuance of a request for bids for the containment cell construction were reached in December 2000. Bids were received in late January and evaluated in February 2001.

Fieldwork began on the sediment de-watering phase of the project in November 2000. Installation of the required facilities (piping, pumps, basins, etc.) to de-water the sediments while the containment cell is being constructed was completed and started up in February 2001. Operation of these facilities will continue until all sediments are placed into the containment cell.

Subject to the inclusion of all comments and agreed upon revisions; approval of the containment cell design by U. S. EPA was received March 5, 2001. A contract for construction of the containment cell was awarded March 8, 2001 to LMS Environmental Contracting, Inc. ("LMS"). Placement of fill for the Containment Cell berms began April 23, 2001. A March 30, 2001 revised draft containment cell design was approved by the Agencies in a May 10, 2001 letter. Construction was completed on the Containment Cell on September 13, 2001. A draft Containment Cell Certification Report was submitted for Agencies' review and approval upon construction completion. The Containment Cell was approved on September 24, 2001 by USEPA and IEPA for receipt of sediment. Placement of sediments into the cell began September 26, 2001.

An Amendment to the UAO was received October 29, 2001. The Amendment modified the project scope of the UAO – adding Creek Sector F sediments removal and placement into the Containment Cell. On August 20, 2001, Solutia requested a change in the Post

Removal Confirmation Sampling and analytical protocols. In a November 30, 2001 communication, the Agency responded with revised sampling and analytical protocols.

Agency Actions / Communications

- Revision 01 Draft Groundwater Monitoring Plan - submitted to the Agencies August 3, 2001 – remains under review.
- The Operations and Maintenance Report - submitted for Agencies' review and approval August 28, 2001- remains under review. Portions of the Plan applicable to the placement of sediments have already been approved.

Work Performed during the reporting period

- Performed weekly inspection of the site.
- Maintained operation of the 50-gpm stormwater treatment system.
- Inspected and maintained the 6oz. Geotextile/6 mil scrim reinforced poly cover over containment cell.
- Maintained stormwater & leachate collection controls around the containment cell.
- Monitored support area facilities.
- Finalized the validation of the analytical results for the post removal creek bottom soil samples.
- Finalized and submitted the human health and ecological risk assessments utilizing the results from the post sediment removal creek bottom sampling.
- Finalized and submitted the EECA report for the creek bottom soils evaluating the need for additional remedial actions in Dead Creek and the alternatives for these actions.

Data Submittal

No data are submitted with this report.

Work scheduled for next reporting period

- Conduct routine inspection of the containment cell.
- Continue operation of the 50-gpm stormwater treatment system.
- Perform necessary operation and maintenance on the containment cell and temporary treatment system.
- Prepare responses to comments received from USEPA on the Mitigation Plan for Dead Creek required by Section 3.C of the Amended UAO, submitted on May 22, 2002.
- Repair the perimeter fence along CS-B where it was broken by a car on the morning of June 16, 2002.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %

Problems and Solutions

Early on Sunday morning, June 16, a car driven by an intoxicated driver ran off the road along Falling Springs Road, crossed the field used for borrow material to construct the containment cell, broke through the fence, and ended up in Dead Creek. One person in the car was slightly injured and a police officer was also injured while climbing a fence trying to get to the accident scene. It is understood that neither injury was serious. The driver was charged with Driving Under the Influence.

The incident was reported to U. S. EPA by electronic mail on June 19, 2002. The fence will be repaired during the next reporting period.

Submittal Schedule Status

See attached UAO schedule

Issues under review

None

Comments

None

May 31 Sauget Area I UAO Sediment Removal Action

SCHEDULE

Deliverable	Description	Due Date
Issuance Date	Date UAO signed by Muno	31-May-00
Effective Date	10 business day after issuance	14-Jun-00
Notice of Intent to Comply	3 business days after effective date	19-Jun-00
Designation of Contractor and Project Coordinator	5 business days after effective date	21-Jun-00
Access	14 calendar days after effective date	28-Jun-00
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	7-Jul-00
EPA Approval of TCRA W/P		May 10, 2001
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	June 10, 2001
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	May 22, 2002